



1 MOTION FOR SUMMARY JUDGEMENT. All other dates in the Court's  
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully  
4 states that the requested extension is necessary due several merit briefs being due  
5 on the same week. For the weeks of August 18, 2025 and August 25, 2025,  
6 Plaintiff's Counsel has eleven merit briefs due. Counsel requires additional time to  
7 brief the issues thoroughly for the Court's consideration. Defendant does not  
8 oppose the requested extension. Counsel apologizes to the Defendant and Court  
9 for any inconvenience this may cause.

10  
11 Respectfully submitted,

12 Dated: August 1, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

13  
14 By: /s/ Jonathan Omar Pena  
15 JONATHAN OMAR PENA  
16 Attorneys for Plaintiff

17  
18 Dated: August 1, 2025

MICHELE BECKWITH  
Acting United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

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21 By: \*/s/ Oscar Gonzalez de Llano  
22 Oscar Gonzalez de Llano  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant

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26 (\*As authorized by email on August 1, 2025)

**ORDER**

Pursuant to the parties' foregoing stipulation and unopposed motion (Doc. 12), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS ORDERED that Plaintiff shall have up to and including October 21, 2025, to serve Plaintiff's Motion for Summary Judgment on Defendant. All other dates in the Scheduling Order (Doc. 5) are enlarged accordingly.

IT IS SO ORDERED.

Dated: August 4, 2025

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE